

CLERK'S OFFICE
U.S. DISTRICT COURT
AT ROANOKE, VA
FILED
August 02, 2024
LAURA A. AUSTIN, CLERK
BY: s/ S. Neily, Deputy Clerk

7-24-mj-103

ATTACHMENT A

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Michael J. Barrett, being duly sworn, hereby depose and state as follows:

1. I am a Postal Inspector employed with the United States Postal Inspection Service (USPIS) since 2022. I am currently assigned to the Roanoke, VA domicile of the Washington Division. My responsibilities include the investigation of federal and state criminal violations involving the United States Postal Service (USPS) and crimes furthered through the use of the United States Mail. I am a "Federal law enforcement officer" within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector.

2. Prior to becoming a United States Postal Inspector, I was a Police Officer with Fairfax County for four (4) years. I attended and completed a six (6) month academy, conducted at the Fairfax County Criminal Justice Academy. During my time as a police officer, I was trained in criminal investigations with regards to assaults, narcotics, violent crimes, as well as other law enforcement duties.

3. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of

controlled substances. I know based on training and experience that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

PROBABLE CAUSE

4. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail parcel bearing tracking number “9505 5144 9526 4213 8776 78” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Jean Janvier, 2306 Staunton Ave NW, Roanoke, VA 24017
- b. Return Address: Marlo More, 2224 W. 78th Street, Inglewood, CA 90302
- c. Origin: Los Angeles, CA 90018, Postage: \$24.75, Date: July 31, 2024
- d. Tracking Number: 9505 5144 9526 4213 8776 78 (Parcel #1)
- e. Description: USPS Priority Mail Box with dimensions 12.25 x 12 x 6
- f. Weight: 2 pounds 15.10 ounces

5. On August 1, 2024, Parcel #1 was identified as a suspected drug parcel inbound to the Western District of Virginia. Parcel #1 was mailed from the Los Angeles, CA 90018 Post Office on July 31, 2024. Continuing, on August 2, 2024, your affiant took custody of Parcel #1. Parcel #1 is a USPS Priority Mail parcel bearing a handwritten label. California is a known drug source area for parcels coming into the Western District of Virginia. A photograph of Parcel #1 is attached as Exhibit #1.

6. Your affiant made inquiries via postal databases, open-source information, and CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information. During the search, your affiant was unable to associate “Marlo More” with the return address of 2224 W. 78th Street, Inglewood, CA 90302. A search of CLEAR indicated the recipient “Jean Janvier” was also not associated with 2306 Staunton Ave NW, Roanoke, VA 24017. In your affiant’s training and experience, drug trafficking organizations utilize different sender and recipient address and name information when sending parcels containing controlled substances and/or drug proceeds through the U.S. Mail.

7. On August 2, 2024, your affiant requested a narcotic detection canine from the Roanoke City Police Department (RPD). Parcel #1 was placed in a blind parcel line-up and subjected to an exterior search by Canine “KNOX.” Officer Frosell advised your affiant at approximately 10:32 a.m. that Canine “KNOX” alerted to Parcel #1. According to Officer Frosell, this positive alert meant Canine “KNOX” detected the odor of an illegal drug emanating from Parcel #1. A supporting affidavit of the narcotics detection training completed by Officer Frosell and Canine “KNOX” is provided as Exhibit #2.


8. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail parcel bearing tracking number “9505 5144 9526 4213 8776 78” addressed to “Jean Janvier, 2306 Staunton Ave NW, Roanoke, VA 24017,” bearing a return address of “Marlo More, 2224 W. 78th Street, Inglewood, CA 90302,” contains controlled substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

9. If, and only if, the contents of Parcel #1 are determined to be contraband in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b), and based on the probable cause previously presented, a search warrant permitting law enforcement to:

A. Monitor the signals emitted by a beeper device, which will be installed in Parcel #1 for the sole purpose of alerting law enforcement when the parcel is opened. This beeper may emit signals from within what would be considered a private area, and

B. Monitor the signals emitted by a GPS tracking device to be installed in Parcel #1 that will indicate the location of the parcel. This GPS may emit signals from what would be considered private areas, including, but not limited to the subject location at 2306 Staunton Ave NW, Roanoke, VA 24017.

C. These two devices will not monitor voice conversations or provide any information other than the location of the parcel, and whether the parcel has been opened.


Michael J. Barrett
Postal Inspector
United States Postal Inspection Service

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 2nd day of August, 2024.



The Honorable C. Kailani Memmer
United States Magistrate Judge
Western District of Virginia